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February 14, 2020

Via ECF

Hon. John G. Koeltl, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

**APPLICATION GRANTED
SO ORDERED**

John G. Koeltl
John G. Koeltl, U.S.D.J.
2/18/20

**Re: Joint Letter Request to Stay Parties' Depositions and Discovery until after
Settlement Conference currently set to March 9, 2020
19-cv-02632-JGK Wu v. Lan Sheng Szechuan Food Inc. et al**

Your Honor,

This office represents the Plaintiff in the above-referenced matter. We write jointly with Defendants to respectfully request that parties' depositions and discovery be stayed until after the Settlement Conference currently scheduled for March 9, 2020 before Hon. Gabriel W. Gorenstein. The parties further respectfully request that we be permitted to propose new dates for depositions should we not be able to settle after March 9, 2020. This is the parties' first joint request to stay parties' depositions and discovery, and grant of such request will not prejudice any party.

On January 10, 2020, the Court ordered Plaintiff's and Defendants depositions respectively be set to January 31, 2020 and February 19, 2020, and discovery be completed by February 28, 2020. *See* Dkt. Nos. 43, 44. After the parties had engaged in good faith in settlement negotiations, they reached a very promising range of settlement amount on January 30, 2020, which we genuinely believed that the case would be settled without going forward with the scheduled depositions. However, on January 30, 2020 afternoon, Defendants changed their mind and decided to go forward with depositions. Due to the time constraint, the parties agreed to reschedule the Plaintiff's deposition of January 31, 2020.

On February 27, 2020, a Settlement Conference before Honorable Judge Gorenstein be scheduled for March 9, 2020 (Dkt. No. 47). Taking into account the adjournment of the parties' depositions and upcoming settlement conference, the parties believe a stay on depositions and discovery would serve the judicial economy and the parties' interest. Given the range of settlement amount the parties reached, we highly believe that Honorable Judge Gorenstein could help the parties settle this matter.

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For the foregoing reasons, the parties respectfully request that the depositions and discovery be stayed until after the Settlement Conference currently scheduled for March 9, 2020 before Honorable Judge Gorenstein and the parties be permitted to propose new dates for depositions for the Court's review and approval after the Settlement Conference of March 9, 2020.

We thank the Court for its continued consideration in this matter.

Respectfully submitted,

TROY LAW, PLLC

s/ John Troy
John Troy
Attorney for Plaintiff

JT/ll

cc: via ECF All
Counsel of Record